

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,	§	
Plaintiff,	§	Case No. 2:24-cv-00093-JRG
	§	(Lead Case)
v.	§	
	§	
HEWLETT PACKARD ENTERPRISE	§	JURY TRIAL DEMANDED
COMPANY,	§	
Defendant.	§	
	§	
	§	
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VIRTAMOVE, CORP.,	§	
Plaintiff,	§	Case No. 2:24-CV-00064-JRG
	§	(Member Case)
v.	§	
	§	
INTERNATIONAL BUSINESS	§	JURY TRIAL DEMANDED
MACHINES CORP.,	§	
Defendant.	§	
	§	
	§	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION AND
REPLY REGARDING MOTION TO TRANSFER (DKT. 78)**

Plaintiff VirtaMove, Corp. (“Plaintiff”) respectfully moves for a two-and-a-half-week extension of time for (1) Plaintiff to file its response to Defendant International Business Machines Corp.’s (“Defendant”) Motion to Transfer Venue to the Northern District of California (Dkt. 78); and (2) a 3-day extension for Defendant to file its reply in support of its motion to transfer.

With a two-and-a-half-week extension from September 4, 2024, the deadline for Plaintiff’s response would be extended to September 20, 2024. Defendant’s deadline to reply in support of the Motion would be due on September 27, 2024 and further extended to September 30, 2024. These extensions are not being sought for purposes of delay, but rather to ensure the parties and their counsel have adequate time to address the issues raised in Defendant’s Motion.

Counsel for the parties have conferred and all parties stipulate to this extension. As part of the stipulation, Plaintiff will not use the extension against IBM, for example, to argue delay. Accordingly, Plaintiff requests that the Court grant the motion and enter the attached proposed Order.

Dated: August 29, 2024

Respectfully submitted,

By: /s/ Qi (Peter) Tong

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is a joint motion.

/s/ Qi (Peter) Tong
Qi (Peter) Tong

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on August 29, 2024.

/s/ Qi (Peter) Tong
Qi (Peter) Tong